

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO, EASTERN DIVISION**

MENG HUANG,

Plaintiff,

v.

GIORGIO RIZZONI,

Defendant.

Case No: 2:19-cv-1976

Judge James L. Graham

Magistrate Judge: Chelsey M. Vascura

DEFENDANT'S PROPOSED AREAS OF QUESTIONING FOR VOIR DIRE

NOW COMES Defendant, Dr. Giorgio Rizzoni, by and through its attorneys, and for his Proposed Voir Dire in this matter, hereby requests the following:

1. Are you familiar with any of the law firms or the attorneys who will present this case, or are any of you familiar with any of the witnesses who may be called to give testimony?

Plf attorneys: Peter Pattakos and Gregory Gipson

Df attorney: Christina Corl

Potential witnesses: Giorgio Rizzoni, Meng Huang, Dyche Anderson, Maryn Weimer, Vishwanath Subramaniam, Kristi Hoge, Jonathan Parry, Matt Page, Megan Lawther, Ruochen Yang, David Cooke, Adithya Jayakumar, Janeen Sands, Jennifer Humphrey, Li Tang, Mrinal Kumar, Marcello Canova, Vishnu Sandaresan, Yann Guezennec, Jung Hyun Kim, Matilde D'Arpino, Tong Zhao, Christopher Beechy, Deepika Rangwani, Sarah Phillip, Sheila Westendorf.

2. Do any of you or any close family members have any training or background in the field of human resources or employment law?

3. Have you ever worked in the area of human resources?
4. Have you ever owned your own business?
5. Have you ever been accused of sexually harassing someone, whether at work or otherwise?
6. Do you feel that you have been sexually harassed or discriminated against either at work or at school? Did you report the harassment? If so, what was the outcome?
7. Has a close friend or relative ever reported sexual harassment or sexual assault to you? If so, what did you do?
8. Do you have any specialized training, education or experience in the area of sexual harassment?
9. Do you have any experience involving the false reporting of sexual harassment or assault?
10. Have you, or a close friend or relative, ever had any experience involving The Ohio State University, which could influence your decision in this case?
11. Have any of you heard or read anything about The Ohio State University or its officials, which would, in any way, interfere with your ability to be objective and impartial concerning the evidence of this case?
12. Have you, or a close friend or relative, ever filed a lawsuit or any other claim alleging harassment or discrimination?
13. Have you, or a close friend or relative, ever been subject to any action which you considered to be discriminatory or unfair in the context of employment?
14. Has anything in your life experience impacted your views on sexual harassment or assault?

15. Has the MeToo movement influenced the way you think about sexual harassment or assault?

16. Do you belong to any organizations designed to raise awareness of sexual harassment or sexual assault?

17. Will you require the Plaintiff to prove this case according to every requirement of the law with which the court instructs you?

18. In considering this case, will you be able to put aside any feeling of sympathy you may have for Plaintiff and decide this case solely on the basis of the evidence and the law as the Court will instruct it to you?

19. If you are convinced that Plaintiff has failed to prove this case, will you have a difficult time returning a verdict for the Defendant and against the Plaintiff?

20. Will you withhold any judgments or opinions about this case until both the Plaintiff and Dr. Rizzoni have presented their cases? In other words, will you avoid making a decision on this case until you hear all of the evidence, not just the evidence presented by Plaintiff, who goes first during trial?

21. Will you agree to follow the law as it is explained to you by the Court even if you do not agree with it?

**Dave Yost
Ohio Attorney General**

/s/ Christina L. Corl
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Counsel for Defendant, Dr. Giorgio Rizzoni

CERTIFICATE OF SERVICE

Please take notice that counsel hereby certifies that the foregoing document was electronically filed/transmitted with the Clerk's Office using its electronic filing system on this **12th day of April, 2023**, which will notify all parties of record via electronic mail.

/s/ Christina L. Corl _____

Christina L. Corl

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